

GIVEARN ANTI-MONEY LAUNDERING (AML) POLICY

Last revised: 03 August, 2023

Givearn Ltd. ("Givearn" or "the Company") is a regulated company registered in the European Union (BG). It operates as a provider of exchange services between Virtual Currencies and recognized Fiat currencies under License #BB-131 issued by the National Revenue Agency. Givearn strictly adheres to the regulations outlined in the EU 5th Anti-Money Laundering ("AML") Directive, ensuring compliance with both international standards and domestic regulations governing the industry.

All capitalized terms used in this AML Policy or in any notice given in connection with this AML Policy have the same meaning as in the Terms of Use unless expressly defined otherwise herein.

I. INTRODUCTION

1. Purpose

The purpose of this AML Policy is to articulate Givearn's steadfast commitment to upholding all relevant EU laws and regulations pertaining to Anti-Money Laundering ("AML") and Counter-Financing of Terrorism (CFT).

By transparently outlining our procedures and guidelines, this Policy emphasizes our dedication to preserving the integrity of the Services, creating a transparent environment, and fostering a relationship of trust with our users. We believe in clear communication and robust safeguards to ensure that Givearn remains a secure, compliant, and reliable platform for all our stakeholders.

2. Objectives

The objectives of this Policy are central to Givearn's commitment to trust and transparency. They include:

- a) **Educate users:** This Policy helps our users understand why Givearn conducts Know Your Customer ("KYC") checks and other regulatory procedures. Education fosters understanding and aligns the interests of Givearn and its users in maintaining compliant and secure Services.
- b) **Detect and prevent money laundering and terrorist financing:** Through robust procedures and controls, Givearn actively detects and prevents activities that could facilitate money laundering or terrorist financing. This not only fulfills our legal obligations but also protects the integrity of our users' assets and the Services as a whole.
- c) **Foster a culture of compliance, ethics, and trust:** Givearn's AML policy is more than a set of rules. It's an expression of our values and our commitment to ethical behavior. By clearly stating our principles and methods, we build trust within our community. We encourage feedback, inquiries, and active participation from our users in maintaining Services that operate with integrity, transparency, and a shared sense of responsibility.

These objectives are integral to Givearn's mission and values, reflecting our commitment to creating a secure environment for all users and partners. By aligning our operations with these principles, we strive to create a platform that exemplifies the highest standards of compliance, security, and trust.

II. UNDERSTANDING KYC AND AML PROCEDURES

1. Why do we conduct KYC checks?

Know Your Customer (“KYC”) procedures are not just a regulatory requirement for Givearn; they are a vital part of our commitment to the safety and integrity of our Services. By identifying and verifying users, these procedures play a crucial role in:

- a) **Protecting against identity theft, fraud, and financial crime:** KYC measures serve as a robust defense against malicious activities, ensuring that your information and assets are secure.
- b) **Compliance with legal obligations:** Adhering to KYC requirements helps Givearn align with all applicable legal obligations within the EU, showcasing our commitment to lawful and ethical conduct.

2. Money laundering and its impact

Money laundering is more than a mere financial offense; it's a serious crime that has far-reaching societal impacts. It involves the concealment of the origins of illegally obtained money, often associated with grave offenses such as organized crime, corruption, and terrorism.

- a) **Preserving integrity of user's funds:** By implementing stringent Anti-Money Laundering (“AML”) and Counter-Financing of Terrorism (CFT) measures, Givearn ensures that your funds are not mixed with illicit money, preserving their legality and integrity.
- b) **Protecting our reputation:** Compliance with AML laws and regulations is vital to maintaining our reputation as a secure and reliable service. It demonstrates our unwavering commitment to ethical conduct and our resilience against unlawful activities.
- c) **Supporting global efforts against crime:** Givearn's efforts to detect and prevent money laundering contribute to the broader societal fight against serious criminal activities, reinforcing our dedication not only to our users but to the well-being and stability of our community at large.

These sections reflect Givearn's proactive and mindful approach to both KYC and AML procedures, focusing not only on legal compliance but also on the security, trust, and social responsibility that we hold dear. By understanding the reasons behind these measures, our users can better appreciate our efforts to create secure Services.

III. RISK ASSESSMENT

1. Risk Identification

Givearn conducts a thorough risk assessment to identify potential money laundering and terrorist financing risks. The assessment considers various factors including, but not limited to:

- a) **Customer Risk:** Evaluating the risk associated with different customer profiles, such as individuals, corporations, and entities in high-risk jurisdictions.
- b) **Geographical Risk:** Assessing the risk related to countries or regions where customers reside or where funds originate or are sent.
- c) **Product and Service Risk:** Analyzing the risk associated with different types of cryptocurrencies, products, and services offered on the platform.
- d) **Transactional Risk:** Examining the risk related to the size, frequency, and nature of transactions conducted through the Givearn Services.
- e) **Technology Risk:** Understanding the risks associated with technological developments, such as new payment methods or use of emerging or complex technologies.
- f) **Legal and Regulatory Risk:** Identifying potential risks associated with changes in relevant legislation, regulations, or sanctions that may impact the company's operations.
- g) **Third-Party Risk:** Assessing the risk involved with third-party service providers, including their compliance with AML regulations.

The risk identification process is dynamic and periodically reviewed to reflect changes in the company's operations, regulatory landscape, and global risk environment.

2. Risk Mitigation

Based on the identified risks, Givearn develops and implements risk mitigation measures that are specifically tailored to reduce or eliminate the potential for money laundering and terrorist financing. These measures may include:

- a) **Enhanced Due Diligence (EDD):** Implementing additional verification measures for customers or transactions deemed to be higher risk.
- b) **Monitoring and Reporting:** Continuously monitoring customer activities and transactions and reporting suspicious activities to relevant authorities.
- c) **Limiting Exposure:** Implementing transaction limits or restrictions on certain products, services, or geographic locations deemed high risk.
- d) **Training and Education:** Regularly training staff to recognize and respond to potential risks, ensuring that employees are knowledgeable and vigilant.

- e) **Use of Technology:** Utilizing advanced technology, such as AI or machine learning, to detect unusual patterns or behaviors indicative of illicit activities.
- f) **Collaboration with Authorities:** Actively cooperating with regulatory and law enforcement authorities to ensure alignment with best practices and compliance with applicable laws.
- g) **Third-Party Oversight:** Regularly reviewing and monitoring third-party service providers to ensure they maintain appropriate AML controls and comply with Givearn's standards.

These risk mitigation measures demonstrate Givearn's proactive approach to preventing illegal activities on our Services and reflect our commitment to maintaining a safe and trustworthy environment for our users.

IV. REPORTING AND RECORD-KEEPING

1. Suspicious Activity Reports

Identifying and reporting suspicious activities is a fundamental aspect of Givearn's commitment to comply with EU AML regulations.

Should any suspicious activities be detected, they will be promptly investigated by our designated Money Laundering Reporting Officer ("MLRO"). If deemed necessary, a formal Suspicious Activity Report ("SAR") will be submitted to the relevant authorities within the required time frame as per local regulations. All reporting is handled with the utmost confidentiality, adhering to legal guidelines, and ensuring that the information is only disclosed to authorized parties.

The suspicious activity reporting is integrated into Givearn's broader AML compliance framework, allowing for a cohesive and effective approach to risk management.

2. Record-Keeping

Record-keeping is an essential component of our AML compliance framework, ensuring that we can provide transparency and cooperate with regulators and law enforcement when required.

- a) **Type of Records:** Givearn maintains comprehensive records, including but not limited to user identification documents, transaction details, account files, business correspondence, and internal and external reports.
- b) **Retention Period:** In compliance with EU regulations, Givearn retains all necessary records for at least five years after the termination of the business relationship or the completion of a transaction.
- c) **Data Security:** All records are stored securely with stringent access controls, safeguarding the privacy and integrity of the data.
- d) **Availability:** Records are maintained in a manner that ensures their timely availability to relevant authorities in accordance with legal requests or regulatory examinations.
- e) **Compliance with GDPR:** Givearn's record-keeping practices are designed to be in full compliance with the General Data Protection Regulation (GDPR), balancing the need for information retention with the privacy rights of our users.

By outlining these specific practices in Suspicious Activity Reports and Record-Keeping, Givearn ensures that its operations align with best practices within the European Union, reflecting a dedication to transparency, cooperation, and lawful conduct.

V. CONCLUSION

Givearn's mission goes beyond providing Services for Virtual Currencies; it is rooted in our unwavering commitment to create a secure, transparent, and trustworthy environment for our users. This AML policy is more than a formal document; it embodies our dedication to abiding by all relevant laws and regulations in the EU. More importantly, it represents our pledge to foster an ecosystem where confidence and integrity flourish.

Your trust is not just valuable to us; it is the cornerstone of everything we do at Givearn. We understand that trust is earned, and we continually strive to honor that trust through our relentless focus on security and compliance.

Should you have any questions, concerns, or simply wish to understand more about this policy or any other aspect of our service, please do not hesitate to reach out to us at support@givearn.com.